

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

“JANE DOE”, a pseudonym

Plaintiff

v.

RHODE ISLAND SCHOOL OF DESIGN

Defendant.

NO.: 18-10-JJM-LDA

**PLAINTIFF’S DEPOSITION DESIGNATIONS OF
VALERIA ALBANI’S DEPOSITION TAKEN OCTOBER 9, 2018**

Plaintiff reserves the right to use any deposition designation listed in defendant’s designations and to supplement said designation.

<u>FROM</u>	<u>TO</u>	<u>VIDEO TIME</u>	<u>BATES #</u>
05:16	05:24	00:01:29.510-00:01:54.410	P003739
06:22	07:02	00:03:00.370-00:03:28.140	P003739-3740
10:22	11:02	00:07:15.360-00:07:30.270	P003741
14:09	16:04	00:11:52.080-00:14:00.710	P003743-3744
16:20	17:08	00:14:57.570-00:15:38.270	P003744
17:10	17:16	00:15:44.350-00:16:07.410	P003744
18:18	18:21	00:17:21.420-00:17:32.146	P003745
22:23	25:08	00:23:22.520-00:26:28.670	P003747-3748
41:08	42:05	00:49:04.200-00:50:23.940	P003755-3756
44:14	47:15	00:54:01.920-00:58:15.070	P003757-3758
55:22	56:06	01:08:55.345-01:09:27.692	P003762
57:21	57:25	01:11:35.265-01:11:51.155	P003763
76:04	76:07	01:33:46.015-01:33:55.835	P003771

81:02	81:08	01:40:55.945-01:41:09.565	P003774
84:21	85:15	01:46:05.835-01:47:08.335	P003776
86:23	87:12	01:49:26.815-01:50:06.862	P003777
92:12	92:21	01:57:12.015-01:57:45.876	P003779
96:15	97:20	02:03:14.215-02:04:46.605	P003781-3782
102:05	102:08	02:10:50.965-02:10:58.645	P003784
103:20	103:24	02:12:25.547-02:12:41.847	P003784
104:04	104:05	02:12:50.767-02:12:53.647	P003784-3785
104:08	104:18	02:12:56.737-02:13:28.187	P003785
105:02	105:07	02:13:54.017-02:14:08.837	P003785
106:22	107:16	02:16:30.197-02:17:40.686	P003786
110:17	115:06	02:22:12.257-02:27:13.177	P003788-3790
115:13	115:16	02:27:36.187-02:27:45.457	P003790
116:02	117:13	02:28:17.367-02:30:06.262	P003790-3791
121:25	122:23	02:34:45.187-02:35:57.976	P003793
128:15	129:02	02:44:03.767-02:44:39.977	P003796
131:08	132:09	02:47:17.315-02:48:31.142	P003797-3798
150:17	150:19	03:13:50.432-03:13:56.412	P003806
150:23	150:23	03:14:01.795	P003806
150:25	151:03	03:14:02.702-03:14:09.674	P003806
151:06	151:06	03:14:16.932	P003806
165:07	165:21	03:33:30.152-03:34:11.601	P003813
168:08	169:19	03:37:28.551-03:39:19.941	P003814-3815

170:10	171:09	03:40:01.581-03:41:25.361	P003815-3816
177:10	177:20	03:50:08.471-03:50:31.301	P003818-3819
178:13	178:25	03:51:32.431-03:52:24.081	P003819

Respectfully submitted,

KLINE & SPECTER, P.C.

David Williams

THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
DAVID C. WILLIAMS, ESQUIRE
1525 Locust Street, The Nineteenth Floor
Philadelphia, PA 19102
(215) 772-1000
Attorneys for Plaintiff

Dated: October 13, 2020

CERTIFICATE OF SERVICE

I, David C. Williams, Esquire, hereby certify that on this date I served a true and correct copy of Plaintiff's Deposition Designations for the deposition of Valeria Albani, taken on October 9, 2018 upon the following parties via the Court's CM/ECF system.

Steven M. Richard, Esquire
Nixon Peabody, LLP
One Citizens Plaza, Suite 500
Providence, RI 02903-1345
Counsel for Defendant, Rhode Island School of Design

KLINE & SPECTER, P.C.

David Williams

Dated: October 13, 2020

By:

THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
DAVID C. WILLIAMS, ESQUIRE
1525 Locust Street, The Nineteenth Floor
Philadelphia, PA 19102
(215) 772-1000
Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

“JANE DOE”, a pseudonym

Plaintiff

v.

RHODE ISLAND SCHOOL OF DESIGN

Defendant.

NO.: 18-10-JJM-LDA

**PLAINTIFF’S DEPOSITION DESIGNATIONS OF
TIMOTHY BLAINE’S DEPOSITION TAKEN JULY 30, 2018**

Plaintiff reserves the right to use any deposition designation listed in defendant’s designations and to supplement said designation.

<u>FROM</u>	<u>TO</u>	<u>VIDEO TIME</u>	<u>BATES #</u>
4:16	4:24	00:00:27.710-00:00:53.130	P003825
6:05	6:07	00:01:59.112-00:02:04.190	P003825
8:08	8:16	00:04:21.783-00:04:52.357	P003826
11:04	11:12	00:07:40.380-00:08:07.720	P003827-3828
12:05	12:15	00:09:17.7210-00:09:52.530	P003828
23:07	25:06	00:24:39.176-00:27:31.310	P003833-3834
27:12	27:22	00:31:39.810-00:32:12.190	P003835
28:05	28:11	00:32:34.592-00:32:58.300	P003835
28:23	29:17	00:33:28.960-00:34:37.936	P003835-3836
33:02	33:17	00:39:03.890-00:39:55.410	P003837
38:05	38:12	00:47:33.130-00:48:00.059	P003839-3840
38:21	39:02	00:48:17.670-00:48:33.250	P003840
39:11	39:13	00:49:05.350-00:49:08.920	P003840

40:22	41:01	00:50:51.190-00:50:58.620	P003841
41:15	42:03	00:51:42.230-00:52:15.370	P003841
42:07	43:06	00:52:33.630-00:53:46.790	P003841-3842
45:14	45:21	00:56:34.820-00:57:01.830	P003843
46:21	47:08	00:58:41.440-00:59:15.530	P003843-3844
52:21	53:14	01:07:30.991-01:08:35.619	P003846
56:11	56:13	01:12:47.319-01:12:58.802	P003848
57:17	57:22	01:13:45.559-01:15:00.794	P003848
59:22	60:04	01:18:04.139-01:18:32.109	P003849
60:20	60:24	01:19:49.359-01:20:54.049	P003850
68:09	69:02	01:29:18.539-01:30:09.855	P003853
69:11	69:21	01:30:39.959-01:31:07.559	P003853-3854
71:18	71:20	01:33:32.069-01:33:39.169	P003854
76:23	77:10	01:39:58.939-01:40:44.659	P003857
77:14	77:18	01:41:08.939-01:41:26.459	P003857
79:24	80:13	01:44:58.359-01:45:38.759	P003858
83:09	85:12	01:49:08.889-01:51:53.189	P003860
87:17	88:08	01:54:39.370-01:55:28.009	P003861-3862
88:11	88:15	01:55:36.279-01:55:47.009	P003862
90:16	91:15	01:58:16.929-01:59:28.586	P003863
92:14	92:18	02:00:51.459-02:01:09.131	P003864
95:23	96:10	02:05:06.309-02:50:40.439	P003865
100:20	101:04	02:11:09.079-02:11:34.099	P003867

101:19	102:04	02:12:08.809-02:12:40.658	P003868
122:03	122:08	02:39:00.989-02:39:15.459	P003877
127:02	127:05	02:45:22.319-02:45:35.139	P003879
128:04	128:21	02:47:02.319-02:48:03.229	P003879-3880
129:07	129:15	02:48:38.469-02:49:06.019	P003880
131:10	131:24	02:51:19.829-02:52:02.619	P003881
148:11	148:19	03:14:05.081-03:14:32.351	P003888-3889
150:19	151:04	03:17:23.191-03:17:52.021	P003889-3890
153:20	153:23	03:21:16.151-03:21:23.381	P003891
162:06	163:21	03:32:37.261-03:34:43.171	P003894-3895
164:04	164:13	03:35:03.011-03:35:34.772	P003895-3896
177:10	177:13	03:51:46.986-03:51:54.441	P003901
182:17	183:05	03:57:58.881-03:58:44.341	P003904
183:22	184:01	03:59:41.001-03:59:56.556	P003904
184:18	184:20	04:00:57.121-04:01:05.899	P003905
197:05	198:18	04:17:31.051-04:19:39.101	P003910-3911
209:11	210:07	04:34:12.637-04:35:12.061	P003915-3916
212:13	212:16	04:37:59.150-04:38:07.059	P003917
212:19	212:23	04:38:14.156-04:38:27.502	P003917
213:02	213:04	04:38:34.129-04:38:39.014	P003917
213:21	213:22	04:39:21.473-04:39:23.191	P003918
213:24	214:01	04:39:26.297-04:39:27.922	P003918
216:23	217:02	04:43:13.498-04:43:24.800	P003919

217:04

217:10

04:43:30.922-04:43:48.570

P003919

Respectfully submitted,

KLINE & SPECTER, P.C.

David Williams

THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
DAVID C. WILLIAMS, ESQUIRE
1525 Locust Street, The Nineteenth Floor
Philadelphia, PA 19102
(215) 772-1000
Attorneys for Plaintiff

Dated: October 13, 2020

CERTIFICATE OF SERVICE

I, David C. Williams, Esquire, hereby certify that on this date I served a true and correct copy of Plaintiff's Deposition Designations for the deposition of Timothy Blaine taken on July 30, 2018, upon the following parties via the Court's CM/ECF system.

Steven M. Richard, Esquire
Nixon Peabody, LLP
One Citizens Plaza, Suite 500
Providence, RI 02903-1345
Counsel for Defendant, Rhode Island School of Design

KLINE & SPECTER, P.C.

David Williams

Dated: October 13, 2020

By:

THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
DAVID C. WILLIAMS, ESQUIRE
1525 Locust Street, The Nineteenth Floor
Philadelphia, PA 19102
(215) 772-1000
Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

“JANE DOE”, a pseudonym

Plaintiff

v.

RHODE ISLAND SCHOOL OF DESIGN

Defendant.

NO.: 18-10-JJM-LDA

**PLAINTIFF’S DEPOSITION DESIGNATIONS OF
ROBERT BRINKERHOFF’S DEPOSITION TAKEN OCTOBER 8, 2018**

Plaintiff reserves the right to use any deposition designation listed in defendant’s designations and to supplement said designation.

<u>FROM</u>	<u>TO</u>	<u>VIDEO TIME</u>	<u>BATES #</u>
5:02	5:20	00:00:48.644 – 00:01:27.020	P003924 – P003925
6:02	6:06	00:01:47.820 – 00:02:04.669	P003925
9:22	9:23	00:05:16.150 – 00:05:20.960	P003927
10:17	11:11	00:06:23.790 – 00:07:26.983	P003927
12:06	12:18	00:08:38.620 – 00:09:18.084	P003928
14:20	15:06	00:12:08.190 – 00:12:49.790	P003929
20:08	21:13	00:19:42.630 – 00:21:26.440	P003932
21:20	22:14	00:22:01.170 – 00:23:23.970	P003932 – P003933
22:24	23:16	00:24:24.650 – 00:25:20.350	P003933
23:20	24:07	00:25:29.460 – 00:26:31.685	P003933
24:19	25:06	00:27:19.010 – 00:27:56.520	P003934
25:16	27:04	00:28:41.670 – 00:31:00.150	P003934 – P003935

<u>FROM</u>	<u>TO</u>	<u>VIDEO TIME</u>	<u>BATES #</u>
28:05	29:10	00:32:45.070 – 00:34:18.906	P003935 – P003936
30:18	32:13	00:36:13.254 – 00:39:17.790	P003936 – P003937
34:25	35:03	00:43:07.680 – 00:43:19.075	P003938
45:19	45:21	00:59:55.084 – 01:00:16.050	P003943
47:11	47:14	01:02:58.480 – 01:03:13.140	P003944
48:06	48:25	01:04:17.770 – 01:05:33.710	P003944 – P003945
49:12	49:15	01:06:17.920 – 01:06:29.070	P003945
50:12	52:02	01:07:39.490 – 01:10:11.810	P003945 – P003946
53:04	53:06	01:11:32.590 – 01:11:39.881	P003947
53:19	53:25	01:12:36.690 – 01:12:59.412	P003947
55:18	56:03	01:15:51.240 – 01:16:32.985	P003948
56:19	57:15	01:17:25.736 – 01:18:40.460	P003948 – P003949
66:14	67:01	01:30:10.235 – 01:30:51.635	P003953
71:10	72:04	01:37:12.795 – 01:38:06.235	P003955 – P003956
74:03	75:08	01:41:12.995 – 01:42:47.865	P003956 – P003957
76:24	78:11	01:44:51.865 – 01:47:12.346	P003958
78:24	79:21	01:48:21.765 – 01:50:01.825	P003959
81:12	82:17	01:53:07.805 – 01:54:34.335	P003960
83:17	84:25	01:55:53.715 – 01:57:23.555	P003961
85:21	86:09	01:59:02.015 – 01:59:54.442	P003962
87:18	88:21	02:02:55.835 – 02:04:17.399	P003963

<u>FROM</u>	<u>TO</u>	<u>VIDEO TIME</u>	<u>BATES #</u>
96:23	97:09	02:17:23.356 – 02:17:58.184	P003967

Respectfully submitted,

KLINE & SPECTER, P.C.

David Williams

Dated: October 13, 2020

By:

THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
DAVID C. WILLIAMS, ESQUIRE
1525 Locust Street, The Nineteenth Floor
Philadelphia, PA 19102
(215) 772-1000
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, David C. Williams, Esquire, hereby certify that on this date I served a true and correct copy of Plaintiff's Deposition Designations for the deposition of Robert Brinkerhoff, taken on October 8, 2018, upon the following parties via the Court's CM/ECF system.

Steven M. Richard, Esquire
Nixon Peabody, LLP
One Citizens Plaza, Suite 500
Providence, RI 02903-1345
Counsel for Defendant, Rhode Island School of Design

KLINE & SPECTER, P.C.

David Williams

Dated: October 13, 2020

By:

THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
DAVID C. WILLIAMS, ESQUIRE
1525 Locust Street, The Nineteenth Floor
Philadelphia, PA 19102
(215) 772-1000
Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

“JANE DOE”, a pseudonym

Plaintiff

v.

RHODE ISLAND SCHOOL OF DESIGN

Defendant.

NO.: 18-10-JJM-LDA

**PLAINTIFF’S DEPOSITION DESIGNATIONS OF
GWENDOLINE M. FARRELLY’S DEPOSITION TAKEN SEPTEMBER 24, 2018**

Plaintiff reserves the right to use any deposition designation listed in defendant’s designations and to supplement said designation.

<u>FROM</u>	<u>TO</u>	<u>VIDEO TIME</u>	<u>BATES #</u>
5:08	5:14	00:01:07.640 – 00:01:23.330	P003972
5:21	5:24	00:01:47.010 – 00:01:58.140	P003972
11:25	12:14	00:08:03.520 – 00:08:43.690	P003975
21:09	22:03	00:19:53.270 – 00:20:48.690	P003979
23:24	24:05	00:23:04.060 – 00:23:22.906	P003980
30:09	30:18	00:31:55.530 – 00:32:22.760	P003983
41:22	42:04	00:46:49.850 – 00:47:10.140	P003988 – P003989
42:14	42:16	00:48:00.160 – 00:48:06.627	P003989
42:20	43:02	00:48:12.760 – 00:48:30.990	P003989
44:08	44:15	00:50:23.460 – 00:50:42.840	P003990
45:11	45:24	00:51:37.550 – 00:52:14.910	P003990
46:03	46:03	00:52:20.418	P003990

<u>FROM</u>	<u>TO</u>	<u>VIDEO TIME</u>	<u>BATES #</u>
60:16	60:21	01:11:27.989 – 01:11:43.529	P003997
62:07	62:12	01:13:57.699 – 01:14:16.239	P003998
63:07	63:14	01:15:17.649 – 01:15:44.539	P003998
64:14	64:23	01:17:01.509 – 01:17:31.040	P003999
70:07	70:14	01:24:05.439 – 01:24:26.129	P004002
71:01	71:06	01:24:59.559 – 01:25:11.699	P004002
75:02	75:25	01:30:38.519 – 01:31:55.769	P004004
76:13	77:15	01:32:42.059 – 01:34:17.874	P004004 – P004005
77:19	77:24	01:34:23.107 – 01:34:35.469	P004005
81:18	82:05	01:39:07.129 – 01:39:44.419	P004007
83:12	84:02	01:41:08.959 – 01:41:56.059	P004008
84:09	84:13	01:42:08.799 – 01:42:21.909	P004008
85:19	86:08	01:43:48.329 – 01:44:21.479	P004009
86:25	87:09	01:45:09.099 – 01:45:46.379	P004009
88:03	88:09	01:46:52.349 – 01:47:18.619	P004010
88:12	88:15	01:47:22.619 – 01:47:30.119	P004010
92:07	92:12	01:51:54.389 – 01:52:05.929	P004012
95:05	95:16	01:55:24.619 – 01:55:53.299	P004013
129:09	130:01	02:36:46.260 – 02:37:31.409	P004029
181:08	182:01	03:41:20.659 – 03:42:03.632	P004053

<u>FROM</u>	<u>TO</u>	<u>VIDEO TIME</u>	<u>BATES #</u>
183:15	183:18	03:43:48.849 – 03:43:57.729	P004054
184:13	186:08	03:44:43.519 – 03:46:38.489	P004055

Respectfully submitted,

KLINE & SPECTER, P.C.

David Williams

Dated: October 13, 2020

By:

THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
DAVID C. WILLIAMS, ESQUIRE
1525 Locust Street, The Nineteenth Floor
Philadelphia, PA 19102
(215) 772-1000
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, David C. Williams, Esquire, hereby certify that on this date I served a true and correct copy of Plaintiff's Deposition Designations for the deposition of Gwendoline M. Farrelly, taken on September 24, 2018, upon the following parties via the Court's CM/ECF system.

Steven M. Richard, Esquire
Nixon Peabody, LLP
One Citizens Plaza, Suite 500
Providence, RI 02903-1345
Counsel for Defendant, Rhode Island School of Design

KLINE & SPECTER, P.C.

David Williams

Dated: October 13, 2020

By:

THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
DAVID C. WILLIAMS, ESQUIRE
1525 Locust Street, The Nineteenth Floor
Philadelphia, PA 19102
(215) 772-1000
Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

“JANE DOE”, a pseudonym

Plaintiff

v.

NO.: 18-10-JJM-LDA

RHODE ISLAND SCHOOL OF DESIGN

Defendant.

**PLAINTIFF’S DEPOSITION DESIGNATIONS OF
JENNIFER K. HOWLEY’S DEPOSITION TAKEN AUGUST 29, 2018**

Plaintiff reserves the right to use any deposition designation listed in defendant’s designations and to supplement said designation.

<u>FROM</u>	<u>TO</u>	<u>VIDEO TIME</u>	<u>BATES #</u>
5:15	5:21	00:01:23.360 – 00:01:40.070	P004066
6:03	6:09	00:02:04.730 – 00:02:25.050	P004066
13:10	13:13	00:10:41.690 – 00:10:48.739	P004069
13:20	13:23	00:11:07.020 – 00:11:18.906	P004069 – P004070
18:04	18:10	00:16:27.620 – 00:16:49.270	P004071 – P004072
24:05	24:09	00:24:31.370 – 00:24:54.220	P004074
29:04	29:05	00:30:08.170 – 00:30:11.700	P004077
29:23	30:12	00:31:27.430 – 00:32:13.680	P004077
31:03	31:13	00:33:21.290 – 00:34:02.804	P004077 – P004078
33:13	33:18	00:37:16.320 – 00:37:40.272	P004079
34:22	35:02	00:39:02.110 – 00:39:20.160	P004079
36:22	37:04	00:42:06.720 – 00:42:29.116	P004080

<u>FROM</u>	<u>TO</u>	<u>VIDEO TIME</u>	<u>BATES #</u>
38:02	38:09	00:43:53.750 – 00:44:18.173	P004081
40:04	40:06	00:46:44.520 – 00:46:52.642	P004082
40:09	40:09	00:47:00.270	P004082
40:11	40:13	00:47:00.550 – 00:47:05.939	P004082
40:16	40:16	00:47:11.690	P004082
40:18	41:16	00:47:11.770 – 00:48:21.930	P004082
41:24	42:02	00:48:31.964 – 00:48:41.416	P004082 – P004083
43:03	43:07	00:49:45.300 – 00:49:59.260	P004083
43:10	43:11	00:50:04.508 – 00:50:06.890	P004083
44:20	45:02	00:51:57.900 – 00:52:30.210	P004084
50:14	51:06	00:58:44.010 – 00:59:43.940	P004086 – P004087
51:22	52:11	01:00:37.390 – 01:01:31.025	P004087
53:03	53:18	01:02:42.250 – 01:03:40.920	P004088
54:22	55:06	01:04:58.350 – 01:05:29.701	P004088 – P004089
57:11	57:15	01:08:13.530 – 01:08:33.540	P004090
59:02	59:06	01:10:31.940 – 01:10:52.340	P004090
60:08	60:13	01:12:21.000 – 01:12:44.971	P004091
63:09	63:14	01:16:24.187 – 01:16:38.497	P004092
70:07	70:22	01:26:37.307 – 01:27:29.920	P004096
73:19	73:23	01:30:44.217 – 01:30:55.127	P004097
81:01	81:22	01:41:00.667 – 01:41:55.087	P004101
82:13	82:18	01:42:48.067 – 01:43:06.971	P004101

<u>FROM</u>	<u>TO</u>	<u>VIDEO TIME</u>	<u>BATES #</u>
100:05	100:19	02:06:23.407 – 02:07:04.797	P004109 – P004110
104:17	104:25	02:12:17.507 – 02:12:40.397	P004112
105:19	105:23	02:13:36.357 – 02:13:49.257	P004112
107:16	108:08	02:16:16.346 – 02:17:06.898	P004113
109:09	109:12	02:18:10.257 – 02:18:15.568	P004114
110:05	110:11	02:18:56.266 – 02:19:15.822	P004114
128:20	129:02	02:42:07.829 – 02:42:30.452	P004123
129:20	130:02	02:43:27.159 – 02:43:50.459	P004123
139:14	140:05	02:56:09.009 – 02:56:49.729	P004128
140:09	140:19	02:56:53.934 – 02:57:20.079	P004128

Respectfully submitted,

KLINE & SPECTER, P.C.

David Williams

Dated: October 13, 2020

By:

 THOMAS R. KLINE, ESQUIRE
 NADEEM A. BEZAR, ESQUIRE
 DAVID C. WILLIAMS, ESQUIRE
 1525 Locust Street, The Nineteenth Floor
 Philadelphia, PA 19102
 (215) 772-1000
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, David C. Williams, Esquire, hereby certify that on this date I served a true and correct copy of Plaintiff's Deposition Designations for the deposition of Jennifer K. Howley, taken on August 29, 2018, upon the following parties via the Court's CM/ECF system.

Steven M. Richard, Esquire
Nixon Peabody, LLP
One Citizens Plaza, Suite 500
Providence, RI 02903-1345
Counsel for Defendant, Rhode Island School of Design

KLINE & SPECTER, P.C.

David Williams

Dated: October 13, 2020

By:

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(215) 772-1000
Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

“JANE DOE”, a pseudonym

Plaintiff

v.

NO.: 18-10-JJM-LDA

RHODE ISLAND SCHOOL OF DESIGN

Defendant.

**PLAINTIFF’S DEPOSITION DESIGNATIONS OF
SYDNEY LAKE’S DEPOSITION TAKEN SEPTEMBER 27, 2018**

Plaintiff reserves the right to use any deposition designation listed in defendant’s designations and to supplement said designation.

<u>FROM</u>	<u>TO</u>	<u>VIDEO TIME</u>	<u>BATES #</u>
05:08	05:10	00:01:21.920-00:01:26.200	P004139
05:13	05:16	00:01:34.550-00:01:41.410	P004139
05:23	06:01	00:02:00.370-00:02:11.850	P004139
12:22	14:13	00:10:01.320-00:12:14.140	P004142-4143
16:09	16:11	00:14:44.110-00:14:49.900	P004144
32:13	32:16	00:37:54.220-00:38:03.910	P004152
44:15	44:19	00:55:58.800-00:56:15.560	P004157
45:04	45:15	00:56:51.030-00:57:29.840	P004157-4158
46:20	47:05	00:59:39.330-01:00:17.920	P004158
53:07	54:01	01:07:59.090-01:08:52.290	P004161-4162
58:23	59:24	01:15:36.490-01:17:06.804	P004164
62:09	62:24	01:20:14.270-01:20:58.790	P004165-4166
63:03	63:08	01:21:22.320-01:21:41.826	P004166

66:03

67:08

01:25:18.540-01:26:40.879

P004167-4168

Respectfully submitted,

KLINE & SPECTER, P.C.

David Williams

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(215) 772-1000
Attorneys for Plaintiff

Dated: October 13, 2020

CERTIFICATE OF SERVICE

I, David C. Williams, Esquire, hereby certify that on this date I served a true and correct copy of Plaintiff's Deposition Designations for the deposition of Sydney Lake, taken on September 27, 2018, upon the following parties via the Court's CM/ECF system.

Steven M. Richard, Esquire
Nixon Peabody, LLP
One Citizens Plaza, Suite 500
Providence, RI 02903-1345
Counsel for Defendant, Rhode Island School of Design

KLINE & SPECTER, P.C.

David Williams

Dated: October 13, 2020

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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

“JANE DOE”, a pseudonym

Plaintiff

v.

RHODE ISLAND SCHOOL OF DESIGN

Defendant.

NO.: 18-10-JJM-LDA

**PLAINTIFF’S DEPOSITION DESIGNATIONS OF
ABRAHAM LUGO’S DEPOSITION TAKEN AUGUST 28, 2018**

Plaintiff reserves the right to use any deposition designation listed in defendant’s designations and to supplement said designation.

<u>FROM</u>	<u>TO</u>	<u>VIDEO TIME</u>	<u>BATES #</u>
05:12	05:19	00:01:14.190-00:01:34.400	P004173
06:09	06:11	00:02:23.400-00:02:34.216	P004173
35:15	35:22	00:42:29.990-00:42:43.656	P004187
39:04	39:16	00:47:17.030-00:47:58.120	P004188
63:14	63:24	01:19:48.831-01:20:30.411	P004199
69:16	70:16	01:28:46.051-01:30:40.848	P004202-4203

Respectfully submitted,

KLINE & SPECTER, P.C.

David Williams

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Philadelphia, PA 19102
(215) 772-1000
Attorneys for Plaintiff

Dated: October 13, 2020

CERTIFICATE OF SERVICE

I, David C. Williams, Esquire, hereby certify that on this date I served a true and correct copy of Plaintiff's Deposition Designations for the deposition of Abraham Lugo, taken on August 28, 2018, upon the following parties via the Court's CM/ECF system.

Steven M. Richard, Esquire
Nixon Peabody, LLP
One Citizens Plaza, Suite 500
Providence, RI 02903-1345
Counsel for Defendant, Rhode Island School of Design

KLINE & SPECTER, P.C.

David Williams

Dated: October 13, 2020

By:

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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

“JANE DOE”, a pseudonym

Plaintiff

v.

RHODE ISLAND SCHOOL OF DESIGN

Defendant.

NO.: 18-10-JJM-LDA

**PLAINTIFF’S OBJECTIONS TO VIDEO-TAPED TRIAL TESTIMONY
OF THOMAS KEVIN O’CALLAGHAN TAKEN OCTOBER 5, 2020**

<u>FROM</u>	<u>TO</u>
27:24	34:07
34:23	35:07
41:16	43:04

In addition, Plaintiff seeks to edit out or otherwise delete the “dead air time” on video from 38:21 minutes to 39:25 minutes to account for a technical issue.

Respectfully submitted,

KLINE & SPECTER, P.C.

David Williams

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Attorneys for Plaintiff

Dated: October 13, 2020

CERTIFICATE OF SERVICE

I, David C. Williams, Esquire, hereby certify that on this date I served a true and correct copy of Plaintiff's Objections to Video-Taped Trial Testimony of Thomas Kevin O'Callaghan Taken on October 5, 2020, upon the following parties via the Court's CM/ECF system.

Steven M. Richard, Esquire
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Counsel for Defendant, Rhode Island School of Design

KLINE & SPECTER, P.C.

David Williams

Dated: October 13, 2020

By:

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